

Our File No. 41,101-N
Rothbard, Rothbard, Kohn & Kellar
50 Park Place, Suite 1228
Newark, NJ 07102
(973) 622-7713
lawyers@rrkklaw.com
James F. Vislosky, Jr. 009201988
Attorneys for Debtors

In Re	:	UNITED STATES BANKRUPTCY COURT
	:	DISTRICT OF NEW JERSEY
Gaudia E. Spence and	:	CHAPTER 13
Rowan Bowen	:	
	:	CASE NO. 19-19601-SLM
	:	
	:	Hearing Date August 26, 2020

CERTIFICATION IN SUPPORT OF MOTION TO
REINSTATE AUTOMATIC STAY AS TO
SPECIALIZED LOAN SERVICING LLC

James F. Vislosky, Jr., of full age, certifies as follows:

1. I am an attorney with the law firm of Rothbard Rothbard Kohn & Kellar, attorneys for debtors.
2. Debtors filed a chapter 13 petition on May 10, 2019.
3. Debtors submitted a Plan that was approved as amended.
4. Debtors made payments required by the Plan through March 2020. Debtors did not make Plan payments to the Trustee for the months of April through July.
5. In or about early April, 2020, Gaudia Spence went into the hospital and was diagnosed with Covid-19. On April 10, 2020 Gaudia Spence passed away as a result of the corona virus. The death certificate (redacted) is attached.

6. Gaudia Spence was the main income producer for debtors. Rowan Bowen is disabled and receives monthly Social Security payments. His income alone is insufficient to complete the plan.

7. On June 24, 2020, Specialized Loan Servicing LLC obtained relief from the automatic stay permitting foreclosure to proceed. At the time the stay relief motion was filed, I was unable obtain from Mr. Bowen sufficient facts to justify opposition to the motion.

8. Debtor's son Rowan R. Bowen has committed to a monthly contribution to debtor's expenses. With this contribution, debtor represents he can complete the plan if amended. A proposed modified plan and certain schedules, including Schedules I and J, were filed on July 21, 2020.

9. Debtor has recently submitted to the mortgage company a request for mortgage assistance. The mortgage company has not yet made a decision on debtor's application.

10. Now, with contributions from debtor's son, Mr. Bowen represents to me that the mortgage payments can continue.

11. Debtor represented to me that he has sent a payment this month to the Chapter 13 Trustee.

12. Debtor requests that the automatic stay be reinstated and he be permitted to finish the Chapter 13 plan in the form of amendment that has been proposed.

I hereby certify that the above statements are true and correct. I am aware that if any of the above is willfully false, I am subject to punishment for contempt of court.

Date: July 23, 2020

/s/ James F. Vislosky, Jr.

STATE OF NEW JERSEY

A0014795501

STATE FILE NUMBER

20200027746

CERTIFICATE OF DEATH

DECEASED NAME

GAUDIA E SPENCE-BOWEN

DATE OF BIRTH

[REDACTED] 963

SEX

FEMALE

DATE OF DEATH

04/10/2020

PLACE OF DEATH

GLEN RIDGE BOROUGH TOWNSHIP

COUNTY OF DEATH

ESSEX

RESIDENCE ADDRESS

7 WHITMAN AVE.

SOCIAL SECURITY NUMBER

[REDACTED] 764

MUNICIPALITY OF RESIDENCE

EAST ORANGE CITY

COUNTY OF RESIDENCE

ESSEX

DOMESTIC STATUS

MARRIED

SURVIVING SPOUSE/PARTNER

(Name given at birth or on birth certificate)

ROWAN BOWENMANNER OF DEATH: **NATURAL**

CAUSE OF DEATH:

**CARDIAC ARREST
ACUTE HYPOXIC RESPIRATORY FAILURE
COVID-19 PNEUMONIA
NOVEL SARS-2 CORONAVIRUS**DATE ISSUED: **APRIL 17, 2020**DATE FILED WITH REGISTRAR: **04/17/2020**

AMENDED DATE:

ISSUED BY:

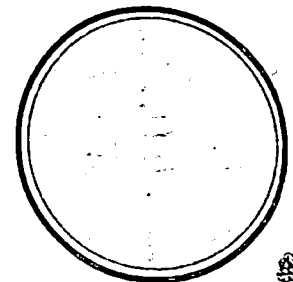
Newark Vital Statistics**Yvonne Stafford, Deputy Registrar**

This is to certify that the above is correctly
copied from a record on file in my office.

*Certified copy not valid unless the raised
Great Seal of the State of New Jersey
or the seal of the issuing municipality
or county, is affixed hereon.*

REG-42A
JUN 14

Vincent T. Arrisi
Vincent T. Arrisi
State Registrar
Office of Vital Statistics and Registry



THIS DOCUMENT HAS MULTIPLE SECURITY FEATURES TO DETER FRAUD; VOID IF ALTERED